



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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July 24, 2020

**BY ECF**

Honorable Kiyo A. Matsumoto  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Rhian Taylor v. City of New York, et ano.  
18 CV 5500 (NG) (ST)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and one of the attorneys representing the City of New York and Detective Joseph Bey in this matter. I write pursuant to § IV(C)(1)(c) of Your Honor's Chambers Practices to respectfully inform the Court that defendants have filed the following motion papers in opposition to plaintiff's motion to amend the complaint:

1. Defendants' Memorandum of Law in Opposition to Plaintiff's Motion to Amend the Complaint (ECF No. 44); and,
2. Declaration of Philip R. DePaul in Opposition to Plaintiff's Motion to Amend the Complaint, and all of the exhibits annexed thereto. (ECF No. 45).

In accordance with the Court's Scheduling Order dated May 29, 2020, the above papers were served on plaintiff's counsel by electronic mail on July 10, 2020. (ECF Entry dated May, 29, 2020.) Pursuant to that same Order, defendants are not providing the Court with courtesy copies of the above papers at this time due to the difficulties posed by the ongoing COVID-19 pandemic.

Defendants thank the Court for its time and consideration of this matter.

Respectfully submitted,

*s/Philip R. DePaul*

Philip R. DePaul  
Senior Counsel  
Special Federal Litigation Division

cc: Honorable Steven L. Tiscione, United States Magistrate Judge (by ECF)  
All Counsel (by ECF)